
BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP d/b/a PACIFIC POWER
& LIGHT COMPANY,**

Respondent

Docket No. UE-230172

**PETITION FOR LEAVE TO
INTERVENE OF WALMART, INC.**

1. Pursuant to WAC § 480-07-355, Walmart, Inc. (“Walmart”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced docket as intervenors with full party status, as described in WAC § 480-07-340. The business address of Walmart is:

Walmart Stores, Inc.
2608 Southeast J Street
Bentonville, Arkansas 72716-0550

2. Walmart will be represented in this proceeding by Parsons Behle & Latimer. All documents relating to this proceeding should be served on Walmart’s attorney and business representatives at the following addresses:

Justina A. Caviglia
Parsons Behle & Latimer
50 West Liberty Street, Suite 750
Reno, Nevada 89501
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3. The administrative rules at issue are WAC § 480-07-340, -355.
4. As shown on Walmart’s website, Walmart operates 65 retail units, two distribution centers, and employs over 22,000 associates in Washington. In fiscal year ending 2023, Walmart purchased \$2.8 billion worth of goods and services from Washington-based suppliers, supporting over 34,000 jobs.¹ Walmart is a large retail customer of Pacific Power & Light Co. (“PPL”), owning and operating approximately four stores and a distribution center in PPL’s Washington service territory. Collectively, these facilities consumer over 26 million kWh on an annual basis, primarily on the Schedule 36 Large General Service Less than 1,000 kW (“Schedule 36”) rate class.
5. Walmart has a direct, immediate, and substantial interest in PPL’s proposed new rates and this proceeding as a customer of PPL. The interests of Walmart will not be adequately represented by any other party to this proceeding.
6. The rates Walmart pays for electric service from PPL in Washington will be affected by a Commission decision in this proceeding.
7. Walmart has not yet determined the extent of its participation or the precise nature of the relief it will request but anticipates participating in this matter to the extent necessary to

¹ <https://corporate.walmart.com/about/washington>

ensure its interests in Washington are protected. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of Walmart's Petition to Intervene. Neither will Walmart's participation unnecessarily broaden the issues or burden the record in this proceeding. Thus, it is in the public interest to allow Walmart to intervene in this proceeding.

8. WHEREFORE, Walmart respectfully requests that the Commission enter an Order granting Walmart permission to intervene in this docket and to participate to the full extent allowed by the law so that it may appropriately represent its interests as circumstances warrant in this proceeding.

DATED this 3rd day of April, 2023.

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia
JUSTINA A. CAVIGLIA
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Attorneys for Walmart, Inc.

CERTIFICATE OF SERVICE

Docket No. UE-230172

I hereby certify that on this 3rd day of April, 2023, I caused to be served, a true and correct copy of the foregoing **PETITION FOR LEAVE TO INTERVENE OF WALMART, INC.**, via electronic mail, to:

<p>Pacific Power & Light Co.</p> <p>Matthew McVee Vice President, Regulation 825 N.E. Multnomah Street, Suite 1800 Portland, OR 97232 matthew.mcvee@pacificcorp.com</p> <p>Jocelyn Pease Katherine McDowell McDowell Rackner & Gibson, PC 419 SW 11th Ave., Suite 400 Portland, OR 97205 katherine@mrg-law.com jocelyn@mrg-law.com</p>	<p>Commission Staff</p> <p>Jeff Roberson Nash I. Callaghan Josephine Strauss Jackie Neira Office of the Attorney General Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 Jeff.roberson@utc.wa.gov Nash.callaghan@utc.wa.gov Josephine.strauss@atg.wa.gov Jackie.neira@atg.wa.gov</p>	<p>Public Counsel</p> <p>Lisa W. Gafken Nina Suetake Ann Paisner Office of the Attorney General Public Counsel Unit 800 Fifth Ave., Suite 2000 Seattle, WA 98104-3188 Lisa.gafken@atg.wa.gov Nina.suetake@atg.wa.gov Ann.paisner@atg.wa.gov Corey.dahl@atg.wa.gov Chanda.mak@atg.wa.gov Roman.doyonnas@atg.wa.gov Brice.hartman@atg.wa.gov</p>
<p>Carla Scarsella Ajay Kumar Zachary Rogala Joseph Dallas Legal Counsel for PacifiCorp PacifiCorp 825 N.E. Multnomah Street, Suite 1800 Portland, OR 97232 Carla.scarsella@pacificorp.com Ajay.kumar@pacificorp.com zachary.rogahal@pacificorp.com joseph.dallas@pacificorp.com</p> <p>WashingtonDockets@pacificorp.com</p>	<p>The Energy Project</p> <p>Yochanan Zakai SHUTE, MIHALY & WEINBERGER LLP 396 Hayes Street San Francisco, California 94102 yzakai@smwlaw.com breckenridge@smwlaw.com</p>	

/s/ Roni L. Shaffer